

REMARKS

In a Final Office Action mailed on November 24, 2008, claims 1-4, 6, 8, 9, 18-22, 24 and 25 were rejected under 35 U.S.C. § 102(b) as being anticipated by Brumme; and claims 7 and 23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Brumme.

In order to anticipate a claim under 35 U.S.C. § 102, a single reference must teach each and every element of the claim. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). In fact, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). Furthermore, in order for a reference to be anticipatory, "[its] elements must be arranged as required by the claim." *In re Bond*, 910 F.2d 831 (Fed. Cir. 1990), *cited in* M.P.E.P. § 2131.

The method of independent claim 1 recites providing a first request to access a function associated with a first object model, converting the first request into a second request associated with a second object model and creating an object associated with the second object model in response to the second request.

Thus, claim 1 requires creating an object associated with a second object model in response to a converted request to access a function associated with a first object model. The Office Action refers to the language in lines 22-44 in column 26 of Brumme for the purported teaching of generating an instance of a foreign object in response to a client request. Final Office Action, p. 6. However, the cited language merely discloses generating an instance of a foreign object in response to a client requesting an instance of an object. In other words, this cited language does not disclose creating an object in response to a converted request to access a function.

Applicant also points out that lines 13-25 in column 27 of Brumme discloses how the adapter responds to a method call. This language does not, however, disclose creating an object in response to a converted request to access a function.

Thus, when the limitations of independent claim 1 are considered in their entirety, it becomes clear that Brumme fails to disclose all of the limitations of this claim. In summary, Brumme discloses creating an instance of a foreign object and accessing a method of a foreign object. However, Brumme does not disclose the specific claim limitations, i.e., creating an

object in response to a converted request to access a function. As such, the § 102 rejection of claim 1 is deficient.

For similar reasons, independent claims 10 and 18 overcome the § 102 rejections. In this regard, the computing system of claim 10 recites a second component to create an object in response to a second converted request to access a function; and the article of claim 18 recites instructions that when executed cause a processor-based system to create an object in response to a second converted request to access a function.

Dependent claims 2-9, 11-17 and 19-25 are patentable for at least the reason that these claims depend from allowable claims for the reasons that are set forth above.

CONCLUSION

In view of the foregoing, Applicant respectfully requests withdrawal of the §§ 102 and 103 rejections and a favorable action in the form of a Notice of Allowance. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (ITL.0902US).

Respectfully submitted,

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